

EXHIBIT A

From: [Tim Barton](#)
To: [Cort Thomas](#); [Tim Wells](#); [Alan Carrillo](#)
Subject: Impeachment Filed Against 'Radical' Judge John Bates For Blocking Trump
Date: Tuesday, February 25, 2025 11:50:34 AM

[EXTERNAL EMAIL] Do not open links or attachments if you cannot verify the sender.

Soon more will be filed its a new day and now the Judges and the cozy relationship with personal views effecting the court system will stop.

https://salemnewschannel.com/watch/impeachment-filed-against-radical-judge-john-bates-for-blocking-trump-67bdb280bc8cbb00014c8cde?utm_source=Broadcast&utm_medium=email&utm_campaign=The%20Trump%20Report&utm_campaign_content=355431&lctg=665326139
<https://salemnewschannel.com/watch/impeachment-filed-against-radical-judge-john-bates-for-blocking-trump-67bdb280bc8cbb00014c8cde>

Sent from ProtonMail Mobile

From: [Tim Barton](#)
To: [Cort Thomas](#)
Cc: [Warren Norred](#); [Charlene Koonce](#); [Tim Wells](#)
Subject: Re: RE: Bank statements that were needed to testify
Date: Saturday, February 8, 2025 10:57:09 AM
Attachments: [image001.png](#)

[EXTERNAL EMAIL] Do not open links or attachments if you cannot verify the sender.

Warren

Please charge me to send a email to Cort and ask him again for what I asked as he wonderfully enjoys forcing me to ever Increase my legal bills to get bank statements that he should of had at his finger tips in order to testify

Miraculously he states he did not have them available he has spent more of my money to find what he should have at the push of the button

Now he wants to flex his big beautiful power over me and remind me of what a non human I am and unworthy to communicate with.

He has informed I am of the unclean cast as in Indian not worth to respond to and deliver bank statements

So please as part of the proper cast of exalted lawyers please carry the request of the unclean and get the bank statements that have been requested months ago.

I have dropped Mr Edeny off this email as he to feels unclean to interact in this foolishness. Fortunately for me it is not me that he see's unclean and of the lower cast.

PS I added judge Starr clerk Tim wells to make Cort happy so they can bill more and as Timmy gives judge Starr his daily report he can tell what horrible things I am doing to cort.

Cort anyway I can assist in you running up more legal work or perhaps you need to hire your cpa that I pay to audit the statements before you send or maybe a hearing before the judge to put me in contempt for asking

Have a Godly and Blessed day I am sure God favors you in the many ways you had out justice to me especially since you have labeled me as JUDAS in your filings

Tim Barton aka Judas
JMJ
SISU

Sent from Proton Mail Android

----- Original Message -----

On 2/6/25 8:40 AM, Cort Thomas wrote:

Good morning, Tim. Please see my January 11, 2025 email (re-attached here). All requests and communications need to go through your lawyers.

Best,

Cort



Cort Thomas

Direct 214.367.6094

Main 214.327.5000

From: Tim Barton <timothy.barton@proton.me>

Sent: Wednesday, February 5, 2025 10:45 AM

To: Cort Thomas <cort@brownfoxlaw.com>

Subject: (No Subject)

[EXTERNAL EMAIL] Do not open links or attachments if you cannot verify the sender.

Cort

Do we have the Balance of bank account statements as the ones we have received were not the important wall ones

Can you put the rest out on Friday

Thank you

Tim

Sent from ProtonMail Mobile

From: [Cort Thomas](#)
To: [Tim Wells](#)
Subject: Fwd: Bank statements
Date: Wednesday, February 12, 2025 11:50:55 AM

Begin forwarded message:

From: Tim Barton <timothy.barton@proton.me>
Date: February 12, 2025 at 10:45:14 AM CST
To: Cort Thomas <cort@brownfoxlaw.com>, Charlene Koonce <charlene@brownfoxlaw.com>, Solomon Norred <sgn@norredlaw.com>, Warren Norred <warren@norredlaw.com>
Subject: Bank statements

[EXTERNAL EMAIL] Do not open links or attachments if you cannot verify the sender.

Charlene

I understand you are confused and not clear what Cort agreed to deliver in October.

He was given a list he confirmed he would gather it as if it did not exist even though it was needed to testify under oath. Even though he wrote its not the same statement needed to testify.

I pay you I pay Cort and now more silly circus acts you are not sure what was given in writing.

Just another act to now run some billing for you. If you chose to take over the process from Cort is there a reason you did not ask for the file read the status so when you answer you are intelligent. Or is it delay delay say you don't know and not sure. Well Cort was sure he has the list and you were Cc on the list.

We will resend again. So you can then say your gonna gather it. Well Cort already has spent billable hours gathering it and so if you think it's not gathered then kindly deduct the billing hours on my bill. As if you bill for collecting what Cort said he would do you are required to deliver what your billing to collect.

Why not go out with some class and professional ethics as opposed to oh I am not sure I thought we gave what was asked. It a bad look for the final act before your vacated again.

Sent from Proton Mail Android

From: [Cort Thomas](#)
To: [Tim Barton](#)
Cc: [Michael Edney](#); [Charlene Koonce](#); [Warren Norred](#); [Kyle Coker](#); [Tim Wells](#)
Subject: RE: RE: (No Subject)
Date: Saturday, January 11, 2025 9:55:00 AM
Attachments: [image001.png](#)

Tim,

The emails you continue to send are unproductive and generally a drain of limited receivership resources in responding to them. I had been hopeful that after the two-hour sit-down with you, Kyle Coker, and Tim Wells, the general pattern of communication would improve, and we would move forward with far more collaboration and cooperation than the last twenty-six months. Unfortunately, within days of that meeting, you apparently created or assisted in the creation on content at [defense-fund.com](#) and <https://bartonreceivership.net/>, which wrongly impugned and defamed me and my team and very likely violated both the Receivership Order and our Agreed Injunction. Given the continued billable time that I have had to devote to dealing with these distractions, I have decided that going forward the most efficient (and cost-effective for the Receivership) means of communicating going forward will be communications with your lawyers (Mike Edney, Kyle Coker, and Warren Norred) and not you individually. Thus, except for emails notifying me that you will be coming to pick up mail, my team and I will once again only respond to emails coming from your attorneys moving forward.

In answer to some of your incorrect assumptions asserted below, I retained accountants, not a bookkeeper. As has been stated multiple times in multiple filings, your refusal to comply with the disclosure requirements in the initial Receivership Order meant that, among other things, (1) I generally did not have access to the Receivership Entities' most recent tax returns, (2) did not have access to the Receivership Entities' accounting records, and (3) did not know which entities did or did not purportedly need to have tax returns filed. Because of this wrongful silence and the non-filing of tax returns for at least two prior years, my accountants were forced to prepare hundreds of tax returns at a huge cost to the receivership. This work was completely separate and apart from their tracing work and commingling analysis.

I never said that a junior lawyer is putting the bank statements together. As an initial matter, again, because of the lack of cooperation in violation of the Receivership Order, I did not have ready access to all bank accounts of all receivership entities at the outset of the Receivership and did not know where to get the statements. Instead, I had to send multiple letters to every bank used by the Receivership Entities. Chase Bank in particular has required multiple requests over multiple years just to get everything the Receivership has requested, and the productions we have received are neither organized nor clearly labeled. I have a paralegal (the same one who has been involved since the outset of the case) who has been pulling the statements you requested when she is able on top of her other billable work. She is nearing completion. If you would like us to send you what we have gathered to date, please have Mike, Kyle, or Warren reach out to request an interim production. Otherwise, we will send to your attorneys as soon as the work is complete. My understanding is that the bank statements she is still tracking down had nothing to do with the limited tracing analysis

performed in 2023.

In terms of your “personal files,” I don’t know if you are referring to your email or to the paper documents from the Turtle Creek Office. If the former, as you know, I did not have access to the Receivership Entities’ email accounts for multiple months after my appointment. As detailed in prior filings, I only received access to these email accounts after you were forced to turnover access to them. In other words, you or your team have had access to those files from the outset of the Receivership. In terms of paper documents, I most recently offered to Kyle that if y’all want to have a vendor copy or scan any of the documents housed at the Receivership storage unit, that is fine. We will just need to set up times for your team and a member of my team to meet there. We will then need to mark whatever boxes/files your team wants pulled, and then your approved vendor can come out and pull (and later return) those documents. Again, that should be coordinated through your lawyers.

As is probably obvious at this point, I am not otherwise responding to the personal attacks direct at me or the references to my family. Your continued assertions that Charlene is a puppet master are both insulting and patronizing as to me, but more importantly are completely unfair to Charlene. She has been tasked with the unenviable duty of zealously advocating for the Receivership as her client. My personal belief is that she has done a phenomenal job executing on these duties, all while not being paid for work performed over a year ago and on top of that billing at drastically discounted rate compared to her other matters. Again, I am optimistic that communications once again only flowing through lawyers will decrease these personal attacks going forward.

I truly hope that you have a fantastic weekend, and I will continue to reiterate that I bear no personal animosity or ill will towards you or your family. Going forward and until I am discharged as Receiver, I will continue to do my very best to fulfill the duties prescribed in the Receivership Order, as well as my personal moral and ethical commitments, to preserve the Receivership Estate.

Best,

Cort



Cort Thomas

Direct 214.367.6094
Main 214.327.5000

From: Tim Barton <timothy.barton@proton.me>

Sent: Friday, January 10, 2025 9:37 AM

To: Cort Thomas <cort@brownfoxlaw.com>

Cc: Michael Edney <MEdney@huntonak.com>; Charlene Koonce <charlene@brownfoxlaw.com>; Warren Norred <wnorred@norredlaw.com>

Subject: Re: RE: (No Subject)

[EXTERNAL EMAIL] Do not open links or attachments if you cannot verify the sender.

Cort

You run up a bill on the bookkeeper of over \$500,000 over the last 2 plus year
Filing tax return that should have never been filed on companies that never had to file.

So if they been on the job this long and they did all they and you say they did for that billing
which you proffered as evidence that tracing was done swore under oath by you.

So with all the accounting work and all the work that been sworn to be done why is it that
when I ask for a few banks statements weeks a day weeks go by. Then you explain one of
your jr lawyers is putting the statements together?

First why are you using lawyer to do bookkeeper work.

Second how is it that copies are not a click away because if you swore under oath you traced
funds then bank statements would be needed.

Third we are asking for these statements because what you filed with the courts was missing
these statement. Meaning how did you swear under oath if you never had the statements.

Fourth if you did have them when you swore under oath why can they not be given within
days from bookkeeper why do you run a bill with a Jr lawyer to get me copies of statements
that you must have had to swear under oath.

Well in the end you will ignore me run up bills and just feel as always you dont have to do
anything

What ever you ask something from me there is a deadline of high noon the next day followed
by a nasty court filing asking to contempt and jail me.

You on the other hand simple delay bill delay and bill.

I would ask you would your mother be proud of what you do and have done to me over these
years. Would she be proud of you suing and terrifying my daughter and her mother when you
admit you checked and found no evidence her mother took \$750,000 as you swore in the filing
you signed.

You see Charlene can be directing all of this as we can clearly see when you study the bill but
it is you Cort that signed your name to all the weapons of a receivership as she artfully writes
in her white paper. In the end again I ask will your mother be proud of your work as you said
your father raised you that way to respect.

No doubt you have responsibilities in your role but the way you execute them is a choice.

You held all my personal files to prohibit any possibilities of me being able to file my taxes. Not
one piece of my personal files will you give and now I ask for statements so I can try to piece
it together and still nothing. I am sure Charlene is chuckling and doing all she can to cause me
tax issue and this is certainly stopping me from being able to file. Which I assume is all your
goal.

So can you now choose to deliver the statements as asked by noon tomorrow would be nice

following Charlene normal protocol to me

Thank you

Tim

Sent from Proton Mail Android

----- Original Message -----

On 12/19/24 11:51 PM, Cort Thomas wrote:

Tim,

My accountants are handling the various filings with the Texas Secretary of State for all Receivership Entities, including TC Hall.

I know that one of our paralegals has been working on the bank statement request. I am not sure if she will be finished this week or not, but I can confirm that she is working on it.

This week, I became aware of a couple of websites that y'all appear to be administrating: defense-fund.com (tied to a Texas non-profit formed by Kyle) and <https://bartonreceivership.net/>. Please know that we are monitoring these sites and analyzing what if anything needs to be done to protect the Receivership and the Receivership website (<https://bartonreceivership.com/>). We will all very possibly need to address these in the near future.

Best,

Cort



Cort Thomas

Direct 214.367.6094

Main 214.327.5000

From: Tim Barton <timothy.barton@proton.me>

Sent: Thursday, December 19, 2024 7:54 AM

To: Cort Thomas <cort@brownfoxlaw.com>; Kyle Coker <kyle@farmercoker.com>

Subject: (No Subject)

[EXTERNAL EMAIL] Do not open links or attachments if you cannot verify the sender.

Cort

Have more have gone delinquent please keep them in compliance it's going to be a big job when all these come back and would appreciate that they are properly maintained till then

Are we going to get the requested bank statements this week

Please advise

Tim

Sent from ProtonMail Mobile